

UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : NO. 24-02752-HWV
Irene Papoutsis Mulkerin :
Debtor : Chapter 7

TRUSTEE'S MOTION TO DISMISS
OBJECTION OF ANDREW WILLIAM MULKERIN
TO TRUSTEE'S PROPOSED ABANDONMENT
DUE TO LACK OF STANDING

AND NOW, comes the Trustee, by his attorney, Steven M. Carr, Esquire, of the law firm of Ream, Carr, Markey & Woloshin, LLP, and files this Motion to Dismiss Objection of which the following is a statement:

1. Movant is the duly appointed Trustee in the above-captioned Bankruptcy.
2. On July 21, 2025, Trustee's filed a Notice of Abandonment with regard to Debtor's interest in the Andrew V. Papoutsis Family Partnership ("FLP").
3. On August 4, 2025, Andrew William Mulkerin ("Mulkerin") filed an objection to the Trustee's proposed abandonment.
4. Mulkerin is the spouse of the Debtor.
5. Mulkerin does not have an ownership interest in the asset.
6. Mulkerin is not a creditor of the Debtor.
7. Mulkerin is not a party in interest as he lacks any stake in the proceeding as to whether the Trustee should abandon an asset that has no benefit to unsecured creditors (given that Trustee has already liquidated sufficient assets as to be able to pay all creditors in full).
8. Thus, Mulkerin lacks standing to object to the proposed abandonment.

WHEREFORE, Trustee prays that the Court pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, as made applicable by the Bankruptcy Rules, dismiss Mulkerin's Objection.

Ream, Carr, Markey Woloshin & Hunter, LLP

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